

United States District Court
Northern District of Texas
Tarrant County

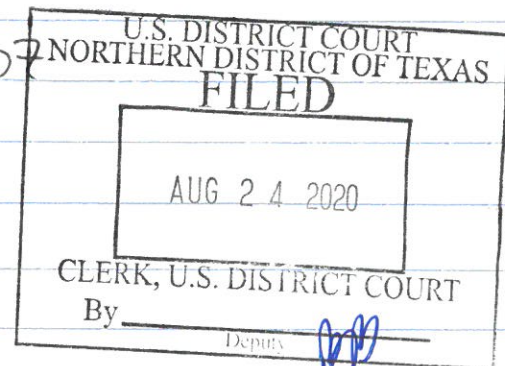
These papers are to be added to

Case #4: 2020CV00807
Blake vs Carr

Contents:

1. Sworn declaration of
Rhonda Long 48712177
FMC Carswell
PO Box 27137
FT Worth Texas
76127

total of 11 pages



This is a Sworn declaration of Rhonda Long 48712177 and I understand in this document that the Facts stated alleging complaint are true to the best of my knowledge and belief.

X Rhonda Long
48712177

The events that have brought me to the decision of joining this classaction are many and varied, I am a Federal inmate # 48712177 as such I am entitled to be protected under the Civil Rights Act. However on my facility of FMC Carswell during the Coronavirus Pandemic I have been subjected to many situations that put my safety at risk. Not the least of which is the lack of Social distancing, Officers & Staff arrogance and invinsibility and being treated cruelly & inhumane. Throughout this pandemic I was told my opinions and observations where not wanted that staff was in control. When this Pandemic hit the news it was scary especially in watching what was going on in other prisons accross the country, when we got locked down and told to social distance we asked How? I lived in a dorm with 295 women on April 1, 2020. Thats 4 women per room. I slept within 2 Feet of 3 other women. There were 295 women in my livingRoom, Using 6 phones, 5 computers, 16 toilets and 12 showers. As an inmate I Knew the only way I would

Contract this disease was if staff brought it thru the door. At this time Warden Carr told staff to wear mask to "protect" the inmates. However most staff did not follow that directive. Ms Goolsby was an officer working my dorm, she had a running nose & a cough I asked her to please put on her mask and she said "I'm not sick" I said again "you don't know that" & she told me "to go to my cell." I sent an electronic Copout to HSA and to the AW reporting her not wearing of mask.

Another officer Ms Gilmore told some of us one day that if she woke up and had a fever she made sure she took some Tylenol before work so she wouldn't have it when she was screened for work cause "girl I ain't taking my vacation days for this shit." I was flabbergasted at the words coming from her mouth. I asked Mr Garcia of Health Service Admin if I could be provided a mask because of my medical condition. I have Asthma, COPD/Emphysema & High Blood Pressure which at 57 makes me High Risk of Death if contracting this deadly virus. He told me "No only officers were getting mask at this time" that was March 28, 2020 I then went to my cell cut up a shirt doubled layered it & sewn myself a mask. Most staff and officers did not say anything to me. A few Ms Kelley, Mr Murphy, & Ms Lee told me they didn't blame me and I wore it

whole in the dayroom, I washed it nightly in the Hot water from the Shower. On April 2, 2020 Mr. Walker the dept head of R&D came in our dorm to supervise us he told me to take OFF my mask & IN FRONT OF The whole dorm he made me stand up and beratted me for having it. He told the whole dorm to "Listen up - You see this right here (pointing at me) This is what you don't do. We will protect you You don't need to protect yourself." Keep in mind as he spoke these words he was pointing at me and was 1 ft from me with No Mask. I was embarrassed, humiliated and angry that he bullied me. Our living Conditions were not only unhealthy physically - mentally they were horrid. We had no soap for washing our hands in the bathroom, we had no bleach to clean or disinfect tables, computers, phones etc. I still remain scarred of Contracting this disease.

Eventually on April 6, 2020 we were provided one disposable Mask to wear for a week at a time. On Mondays we were given a new one We called these day 'Mask Monday' In May we were provided with cloth mask that we could wash (of course our Washing Machines only had cold water) so we washed them in the Hot Shower with us.

I asked for a mask that would protect me from people not wearing theirs properly

Because the mask we were provided only protected people from me, IF they weren't wearing their mask I was at Risk. I was told no by HSA, & medical. I then asked Warden Michael Carr on May 12 to allow me to purchase one and have it sent in - I was denied. I could not protect myself from STAFF who would not wear their mask including Executive Staff such as Mr Walker, Mr Pizzarro, LT Anthony, to officers like Ms Goolsby, Ms Salis, Mr Rodriguez and others. I began wearing 2 cloth mask at all times. I was told by staff that "your names ringing - Girl your being too difficult." This officer was letting me know that others were talking about my outspokenness. I was sentenced to 180 months not to death & my Constitution gives me the right to address issues concerning my safety while incarcerated. I felt I wasn't being difficult but being prudent. On July 1st, 2020 Ms McNeely (a nurse) came & repossessed everyone's Nebulizer Machines as part of my respiratory therapy I have several meds everyday Advair (twice a day) Singular (nightly) Albuterol Sulfate (as needed) and Duo Nebulizer Treatment 3 times a day including Ipratropium Bromide Solution & Albuterol Sulfate solution. All these medicines combined help me maintain my active

having been answered - I have included the copout as evidence - it said "Your Provider has reviewed your current therapy that is in place and has reveded this is sufficient at this time as maintanance - Should your symptoms change Please seek immediate assistance" - As I was reading this copout that day I was thinking well of course my current therapy was sufficient it included 3 nebulizer treatments daily as maintanance, and I thought for 5 days I have requested Breathing Treatments which were denied each day several times how was seeking immediate assistance going to help me? Then on July 6, 2020 I was told to pack my stuff I was being moved to NCC4 so I could resume my therapy. At that point I was Thankful that my respiratory health wasn't going to get worse, that I would be able to do my breathing treatments 3x daily. Then I was brought to my room on NCC4 which was one of only 4 Rooms on the entire floor that weren't housing Covid-19 Patients. The whole floor 83% of it was Covid-19 Positive.

When I got to my Room #7 Another inmates property was in the room, closet and lockers. This inmate who was an INA (inmate nurse assistant) ^{Crystal Thomas} had tested

positive for Covid-19 and been moved to another room. Ms Lopez (a nurse on NCCU) came and removed all property. She gave me wet wipes to clean the whole room with stating there were no chemicals to clean with. So I was upset going into a room where a Covid-19 positive person had been living without it being properly cleaned first.

I used the wipes (2) than I used my shampoo to clean the best I could (shampoo is not a disinfectant) In being put in Room 7 I discovered the call buttons did not work. The only way to get assistance was to yell out the door for someone. I was told not to do that. So I was just in a room with no way to communicate my needs.

I discovered as I cleaned ants in the room, a clogged sink in the bathroom, a floor that needed sweeping & mopping with hair & spilled food on it. I had to run the shower for 30 minutes or longer for the water to get hot. I moved in on July 6, 2020 - I told officer & wrote cop-acts about the room condition daily. On July 9, 2020 I was given some cleaning supplies but no broom & no mop. I had been on my hands & knees with paper towels and shampoo cleaning the floor. I again

asked for a broom and mop on the 10th as well as cleaning supplies again, sent copouts concerning Ants in Room in locker, on window, sill on my clothes and my bed to NO Avail. I wrote about my Clogged Sink & NO Hotwater in Shower to NO Avail. I wrote Cop-outs asking for Cleaning Supplies and Soap for the bathroom to wash my hands with to NO Avail.

I was denied Law Library Computer Access from July 6, 2020 when I was moved to NCCY AND was only allowed Phone use Sporadically from that day. I had no TV and nothing to read as they no longer gave books due to Covid-19. I was able to get my breathing treatments which I WAS TOLD TO BE GRATEFUL FOR. I Felt I was being punished and ostracized due to needing neb treatments to maintain my lung function. On July 23, 2020 Mr Sanjur brought my sack lunch to me it contained Salami that was Rancid. I showed it to him and asked for a different Sack He said "I should be grateful I'm even getting fed and NOT TO WEAR OUT my welcome." At that point I had been living with a room condition that was deplorable for 17 days with Ants, NO cleaning Supplies, NO Hot water in Shower, a clogged sink, NO TV, NO Access TO Legal Law Library Computer, NO Phone (on most days) and

generally being treated as a problem, with his words I made a decision to QUIT waiting on Staff to Care about me and my situation and I tasked Ms Rex (Case mgr on NCCU) For a few 8.5's I wrote up Mr Sangur and the rancid meat, I wrote up a 2nd grievance on the condition of my room and a 3rd for not having access to law library computer. I decided I had no recourse that was on a Thursday afternoon on July 23, 2020 Monday the 27th. Ms Rex brought an Ant Bait to my room, Commander Ward delivered Hygienes & Soap for bathrooms, Facilities-Mr. Beck came to check the hot water & clogged sink, which he fixed on July 28, 2020. Then we were given Chemicals to clean with finally again (2nd time since July 6, 2020) and this time we were given a Broom & mop. On that day I was allowed access to the computer. I was shocked at how fast everything was done. Since that day I still have to beg for Chemicals to clean with & a broom. I get it around 1 time a week. I still have trouble on some days with Computer Access, Sanitary Pads and being allowed two phone calls a day. It's a real struggle daily to live on NCCU where Nurses are in direct contact with Covid 19 patients and then

Come to my Room for temperature checks wearing the same gloves & PPE - I ask them to change daily & most comply but why should I have to ask? It make no sense when the CDC has put out those guidelines and I am at their mercy. I feel Warden Michael Carr has put my life in jeopardy by being lackluster in his supervision of staff and their attitude of invincibility. I have served just under 50% of my sentence and I am not eligible for The Cares Act for that reason. Being put on N95 for breathing treatments is like being treated as a mushroom - Put in the dark and fed bull_ + I hope your court is able to help those of us with no power or control to help ourselves

I declare under the penalty of perjury that this statement is true & correct
Executed on August 15, 2020

Rhonda Long #48712177
RHONDA LONG

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BP-S148.055 INMATE REQUEST TO STAFF CDFRM

SEP 98

U.S. DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF PRISONS

TO: <u>AW CAMPOS (MEDICAL)</u>	DATE: <u>7.5.2020</u>
FROM: <u>RHONDA LONG</u>	REGISTER NO. <u>48712177</u>
WORK ASSIGNMENT: <u>Med unassigned</u>	UNIT: <u>1 NORTH</u>

SUBJECT: (Briefly state your question or concern and the action you are requesting. Continue on back, if necessary. Your failure to be specific may result in no action being taken. If necessary, you will be interviewed in order to successfully respond to your request.)

My Nebulizer was taken on 7-1-2020 I have asked for my treatments everyday since
I have found this to be true in relation to my health history. You can't predict when^a Asthma Attack / COPD Attack may happen. However if you use Preventive Meds correctly these attacks do come less frequently. I have Advair, Singular & Duo Nebulizers for Preventive Medication. With my history I know all 3 medications used properly work, I also know when I don't take any of them I become aspirated(?) and have problems. A ProAir Inhaler is a Rescue measure It is Not Preventive Maintenance & should never be used as such I need in order to maintain the Lung Function I have. My Duo Neb Treatments. Please find away to allow my therapy as Prescribed. Thankyou

(Do not write below this line)

DISPOSITION:

your provider has reviewed your current therapy that is in place and has revealed this is sufficient at this time as maintenance. - should your symptoms change please seek immediate assistance.

Signature Staff Member

Date

7/5/20

Record Copy - File; Copy - Inmate
 (This form may be replicated via WP)

This form replaces BP-148.070 dated Oct 86
 and BP-S148.070 APR 94

Sufficient? This is the kind of crap I'm talking about when dealing with Medical Personal at this Place - My current therapy includes Breathing Treatments that is why I haven't had an attack in a few years!

Catch 22 situation

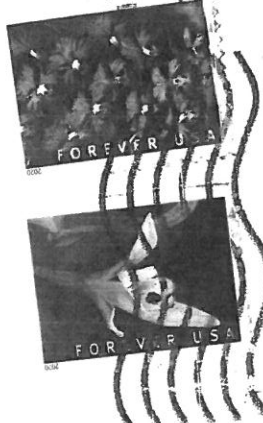
FBOP Medical is a joke
Incompetant!

Name Rhonda Long
Reg. No. 48712177
Federal Medical Center, Carswell
P.O. Box 27137
Ft. Worth, TX 76127

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FMC Carswell
P.O. Box 27066
Fort Worth, TX 76127
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The enclosed letter was processed through special mailing procedures for forwarding to you. The letter has neither been opened nor inspected. If the writer raises a question or problem over which this facility has jurisdiction, you may wish to return the material for further information or clarification. (4)

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Northern District of Texas
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